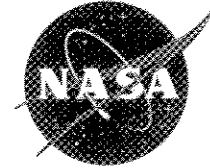


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



April 22, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the South Africa Embassy hosted by the American Institute of Aeronautics and Astronautics (AIAA) on April 27, 2011

On April 27, 2011, the American Institute of Aeronautics and Astronautics, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a reception at the South Africa Embassy, in Washington, D.C., at 6:00 PM – 9:00 PM. The reception is to celebrate South Africa's Freedom Day and to help promote the upcoming International Astronautical Congress in October 2011, in Cape Town, South Africa.

Approximately 350 people have been invited to attend, including NASA personal, AIAA members, staff and affiliates of the Embassy of South Africa, state and local officials, employees of other Federal agencies, as well as South Africans living in the Washington, D.C. area. The estimated cost of the luncheon, including all food and beverages, is approximately \$60 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect the AIAA, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the AIAA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone